

US EPA ARCHIVE DOCUMENT



STATE OF MISSISSIPPI

HALEY BARBOUR
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

March 31, 2004

Mr. James I. Palmer, Jr.
Regional Administrator
U. S. Environmental Protection Agency
Region 4
61 Forsyth St., S.W.
Atlanta, Georgia 30303-8960

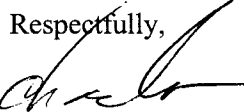
Dear Mr. Palmer:

The Mississippi Department of Environmental Quality (MDEQ) has joined with DeSoto County in supporting the Memphis Metropolitan Statistical Area (MSA) Early Action Compact (EAC) or agreement as a proactive means of achieving compliance with the 8-hour ozone standard ahead of the Federally-mandated compliance date.

Although DeSoto County is included in the Memphis MSA, we believe that DeSoto County is a separate area and entity from the Memphis, Tennessee area and should be considered as a separate attainment area from the Memphis nonattainment area. However, in the interest of regional cooperation and mutual benefit, MDEQ and DeSoto County continue to support the EAC for the Memphis, Tennessee area and surrounding areas, including DeSoto County. DeSoto County and MDEQ continue to work in support of the Memphis process that will develop the attainment plan for the Memphis, Tennessee area.

Enclosed is the Air Quality Improvement Plan for DeSoto County as agreed to in the Early Action Compact and our letter of December 24, 2002. The plan consists of local control measures and state control measures for DeSoto County. This plan is combined with the submittals of the other parties to satisfy this requirement for the EAC. The modeling and weight-of-evidence are being submitted by Shelby County or the Tennessee Department of Environment and Conservation (TDEC) and are hereby referenced. We are not duplicating this information, but it applies equally to DeSoto County and Crittenden County, Arkansas. The local control plan and state control measures for DeSoto County, that becomes a part of the EAC plan, has been developed jointly by MDEQ and DeSoto County officials after a comprehensive stakeholder process.

If you have any questions, please advise.

Respectfully,

Charles H. Chisolm
Executive Director

CHC:jar
Enclosure

cc: Tony Davis, Arkansas Department of Environmental Quality
Marcus Devine, Arkansas Department of Environmental Quality
Barry Stephens, Tennessee Department of Environment and Conservation
Betsy Child, Tennessee Department of Environment and Conservation
Diane Arnst, Memphis & Shelby County Health Department
Jim McDougal, DeSoto County, Mississippi
David Armstrong, DeSoto County, Mississippi

CHAMBERLIN AND NOWAK
Attorney for the Board

W/E. "Sluggo" DAVIS
Clerk of the Board

DAVID ARMSTRONG
County Administrator



Administration Building - 2000

BOARD OF SUPERVISORS
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BOARD OF SUPERVISORS

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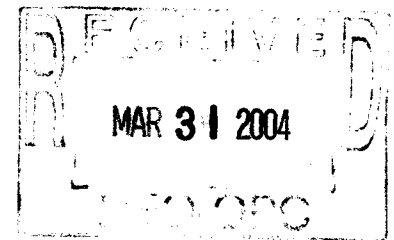
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March 30, 2004

Mr. James I. Palmer, Jr.
Regional Administrator
U. S. Environmental Protection Agency
Region 4
61 Forsyth St., S.W.
Atlanta, Georgia 30303-8960



Dear Mr. Palmer:

DeSoto County has joined with the Mississippi Department of Environmental Quality in supporting the Memphis Metropolitan Statistical Area (MSA) Early Action Compact (EAC) or agreement as a proactive means of achieving compliance with the 8-hour ozone standard ahead of the Federally-mandated compliance date.

Although DeSoto County is included in the Memphis MSA, we believe that DeSoto County is a separate area and entity from the Memphis, Tennessee area and should be considered as a separate attainment area from the Memphis nonattainment area. However, in the interest of regional cooperation and mutual benefit, DeSoto County continues to support the EAC for the Memphis, Tennessee area and surrounding areas, including Desoto County.

Mr. James I. Palmer, Jr.
March 30, 2004
Page Two

DeSoto County continues to work with the MDEQ in support of the Memphis process that will develop the attainment plan for the Memphis, Tennessee area. The local control plan and state control measures for DeSoto County, that becomes a part of the EAC plan, has been developed jointly by MDEQ and DeSoto County officials after a comprehensive stakeholder process. DeSoto County supports this control plan to be submitted by MDEQ by March 31, 2004.

If you have any questions, please advise.

Respectfully,

A handwritten signature in black ink, appearing to read "Eugene Thach". The signature is fluid and cursive, with the first name "Eugene" written in a larger, more prominent script than the last name "Thach".

Eugene Thach, President
DeSoto County Board of Supervisors

Cc: Charles H. Chisolm, MDEQ

**DeSoto County, Mississippi
Air Quality Improvement Plan for the
Memphis Metropolitan Statistical Area
Early Action Compact**

Prepared by the
Mississippi Department of Environmental Quality

For submittal to the
United States Environmental Protection Agency, Region IV

March 31, 2004

I. Introduction

As a participant in the Early Action Compact (EAC) for the Memphis Metropolitan Statistical Area (MSA), DeSoto County and the State of Mississippi have developed this Air Quality Improvement Plan. The emission reduction measures include control measures to be enacted at the state level, local control measures adopted by the county, and voluntary measures. Attached is a letter from the DeSoto County Board of Supervisions supporting this plan.

The detailed documentation and modeling analysis supporting this plan, along with those offered by other counties in the EAC, is in the *“Early Action Compact Modeling Analysis for the State of Tennessee and Adjacent Areas of Arkansas and Mississippi Technical Support Document”* from Systems Application International, Inc. This document also includes the attainment demonstration for the Memphis area. The emission reductions from the measures included in this plan exceed those modeled in the final control strategy run (AS-4) presented in the Technical Support Document.

II. State Control Measures

1. Ozone Action Days

In coordination with the Memphis-Shelby County Health Department and the Arkansas Department of Environmental Quality, MDEQ will forecast days when high ozone levels are expected. Days when the maximum eight-hour ozone average is forecast to be above 84 parts per billion will be designated as ozone action days. This will be implemented for the 2005 ozone season. Both mandatory and voluntary measures to reduce ozone precursor emissions will take place on forecast ozone action days.

2. MDEQ Regulatory Measures

The following measures are being considered by MDEQ to be included in the State Implementation Plan due December 31, 2004, if the States of Arkansas and Tennessee will include similar measures for Crittenden, Shelby, Fayette, and Tipton Counties.

- NO_x RACT at major stationary sources
- VOC RACT at major stationary sources
- Stage 1 vapor control and gasoline retail stores
- State open burning restrictions on ozone action days

3. MDOT Emission Reduction Measures

The Mississippi Department of Transportation (MDOT) is considering several measures to reduce emissions in DeSoto County. These measures are explained in the attached letter from MDOT.

III. Local Control Measures

1. County Emission Reductions on Ozone Action Days

DeSoto County will commit to the reduction of discretionary activities on ozone action days. These measures will be implemented by the 2005 ozone season. The following activities will be reduced:

- Road maintenance activities such as asphaltting and use of heavy equipment;
- Grass cutting and similar activities on right of ways and other city/county property;
- Use of solvent based paint; and
- Open burning activities.

2. Low Emission Vehicles and Equipment

DeSoto County will commit to purchasing low emission vehicles to replace older equipment as new equipment is needed. This could include alternative fuel or clean burning heavy-duty vehicles. This measure will be implemented by March 2005.

IV. Voluntary Measures

1. Ozone Awareness Program

DeSoto County in conjunction with MDEQ will develop an ozone awareness program focused on businesses, industries, and the general public. The purpose of the program will be to educate them on ozone, its causes, and actions that can be taken to reduce ozone precursor emissions. The rideshare and carpooling programs coordinated by the Memphis MPO will be promoted as well.

2. Texas Gas Compressor Station emission reductions

Texas Gas operates a natural gas compressor station in Lake Cormorant, Mississippi. The facility has committed to running the reciprocating engines (engines one through seven) at 90% of rated load during Ozone season. This will result in a 50% NO_x reduction from those engines and a 0.45 ton per day total NO_x reduction from the facility. This measure will be implemented by March 31, 2005.

3. Idling Emission Reductions

While there isn't any heavy industry in DeSoto County, there are several light manufacturing and distribution facilities. MDEQ is promoting voluntary idling reduction programs to reduce the amount of time that trucks idle while at these facilities. The average emissions resulting from a single idling truck is 0.3 pounds per hour of NO_x. A reduction of 645 truck idling hours per day would result in 0.1 tons per day NO_x reduction.

4. Reductions on Ozone Action Days

This measure is the voluntary reduction of ozone precursors on forecast ozone action days only. DeSoto County and MDEQ will encourage businesses and industries in the county to develop plans and measures that will be taken on ozone action days to reduce ozone precursor emissions. Voluntary reductions of this type will not necessarily occur at any time other than ozone action days.

Open burning of waste material is generally prohibited by State Regulations; however, there are exceptions such as open burning of land clearing debris and for silvicultural and agricultural purposes. Open burning for these purposes will be discouraged on ozone action days.

V. Additional Weight of Evidence for DeSoto County

DeSoto County is currently attaining the 8-hr standard. Future year modeling demonstrates that the County will continue to attain the standard in 2007 and through 2012. The weight of evidence argument for the entire MSA is included in Section 8 of the Technical Support Document.

William R. "Bill" Minor
Northern District Commissioner

Dick Hall
Central District Commissioner

Wayne H. Brown
Southern District Commissioner



Larry L. "Butch" Brown
Executive Director

Harry Lee James
Deputy Executive Director/
Chief Engineer

P. O. Box 1850 / Jackson, Mississippi 39215-1850 / Telephone (601) 359-7001 / FAX (601) 359-7110 / www.goMDOT.com

March 30, 2004

Mr. Charles H. Chisolm
Executive Director
Mississippi Department of Environmental Quality
P.O. Box 2035
Jackson, MS 39289-1305

SUBJECT: Early Action Compact (EAC) – DeSoto County


Dear Mr. Chisolm:

The Mississippi Department of Transportation (MDOT) is actively considering taking the following actions to help reduce Ozone levels in DeSoto County:

1. Placing additional restrictions on open burning, construction activities and maintenance activities on days with high ozone levels. This will require modification of existing as well as future contracts with construction firms.
2. Designating two of the additional lanes that will be added to I-55 from MS 304 to the Tennessee State Line as high occupancy vehicle (HOV) lanes, where feasible and reasonable, to encourage ridesharing.
3. Providing additional Congestion Mitigation/Air Quality funds in DeSoto County.
4. Providing additional enhancement program funds for developing pedestrian and bikeways in DeSoto County.

Mr. Dwight Wylie's presentation to MDOT management concerning the EAC and Ozone levels in Mississippi was very informative. Please let me know if we can assist further.

Sincerely,



Larry L. "Butch" Brown
Executive Director

LLB:RNS:edh

cc: Mr. Dwight Wylie, Chief, Air Division, MDEQ
Mr. Harry Lee James, Deputy Executive Director/Chief Engineer, MDOT
Mr. W. Ray Balentine, P.E., CPM, Director, Office of Intermodal Planning, MDOT

